



Solutia Inc.

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February 21, 2000

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I January 21, 1999 Administrative Order by Consent
• **Interior trenching on Site "I"**

Dear Mr. McAteer,

Pursuant to Section XVI "Modifications", of the Administrative Order by Consent for the Sauget Area I Site, Sauget and Cahokia, Illinois, which became effective January 21, 1999, Solutia proposes the following modification to the Sauget Area I Support Sampling Plan ("SSP") as approved September 9, 1999.

Solutia has worked for several months and expended an inordinate amount of time and expense in attempts to obtain access from Cerro Copper to perform interior trenching on Site "I". In spite of these good faith efforts, Cerro Copper has continued to refuse to grant access to Solutia for the purpose of performing interior trenching as required by the approved SSP. Summarizing the current situation:

- Solutia has demobilized its trenching crews and equipment from Sauget Sites Area I. These crews and equipment will not be needed again to fulfill the Work required by the SSP - except to perform the interior trenching on Site "I". The incremental costs associated with procurement of new crews and equipment to perform the interior trenching on Site "I" would also not otherwise need to be incurred and should not be borne by Solutia.
- Cerro Copper is the owner of Site "I" and is a PRP for Sauget Sites Area I.
- In its attempts to gain access, Solutia's offers to Cerro Copper to address their concerns with the performance of the interior trenching on Site "I" have been more than reasonable.

- It is highly unlikely that Solutia and Cerro Copper can reach an agreement whereby Solutia would be allowed to perform the required interior trenching work in the foreseeable future.

Therefore, Solutia requests that U. S. EPA modify the SSP to remove the requirement that Solutia perform the interior trenching on Site "I" and that U. S. EPA alternatively issue an order to Cerro Copper to undertake the trenching.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", written in a cursive style.

D. M. Light
Manager, Remedial Projects
Solutia Inc.